

# **EXHIBIT 3**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE ZOOM VIDEO COMMUNICATIONS,  
INC. PRIVACY LITIGATION

CASE NO. 3:20-cv-02155-LB

This Document Relates To:

ALL ACTIONS

**DECLARATION OF TINA WOLFSON IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR (1) FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT; AND (2)  
ATTORNEYS' FEES, EXPENSES, AND  
SERVICE PAYMENTS**

Judge: Hon. Laurel Beeler  
Courtroom: B-15th Floor  
Date: April 7, 2022  
Time: 9:30 a.m.

1 I, Tina Wolfson, declare as follows:

2 1. I am a partner at the law firm of Ahdoot & Wolfson, PC.

3 2. Pursuant to the Court's Order Appointing Interim Co-Lead Class Counsel and  
4 Plaintiffs' Steering Committee, I was appointed by the Court to serve as Interim Co-Lead Class  
5 Counsel in this action. Dkt. 92. Along with my other Class Counsel, Mark Molumphy, I  
6 determined the litigation strategy on behalf of all plaintiffs and supervised the work performed  
7 during all phases of the litigation on behalf of the proposed class. I, and others at my firm,  
8 performed many duties in this litigation, including researching and preparing pleadings;  
9 researching and arguing pleading motions, including multiple rounds of motions to dismiss;  
10 overseeing all aspects of discovery of both parties and third parties; attending discovery  
11 conferences and researching and arguing discovery motions presented to the Court; attending  
12 status conferences with the Court and presenting Plaintiffs' positions; coordinating the retention  
13 of technical and damages expert consultants, and utilizing their opinions in discovery, pleadings  
14 and settlement negotiations; preparing mediation briefs and participating in settlement  
15 negotiations; preparing the settlement agreement; preparing preliminary and final approval papers,  
16 including proposed class notices and claims forms; retaining and coordinating the work of the  
17 claims administrator, including dissemination of notice to over 150 million class members and  
18 establishing a comprehensive settlement website; responding to class inquiries about the settlement  
19 and assisting with submission of settlement claims. I also supervised the delegation and oversight  
20 of work assigned to the Plaintiffs' Steering Committee ("PSC"), including interviewing and vetting  
21 clients for inclusion on the consolidated complaints; confirming factual allegations to assist in  
22 drafting and finalizing consolidated complaints; research and preparing legal briefs and presenting  
23 oral argument in support of and opposition to pleading and discovery motions; ensuring  
24 preservation of evidence and related documents of the consolidated plaintiffs; coordinating with  
25 plaintiffs to assist in drafting initial plaintiffs' initial disclosures; coordinating with plaintiffs to  
26 draft, verify, and serve plaintiffs' responses to interrogatories and requests for production;  
27 collecting, analyzing, and compiling responsive documents for plaintiff document productions;  
28

1 assisting plaintiffs with review, approval, and execution of the settlement agreement; and assisting  
2 plaintiffs and class members with the claims process and submission of settlement claims.

3 3. A list of the individuals at my firm who worked on this matter, along with their  
4 years in practice, most recent hourly rates, hours spent, and total lodestar, is attached hereto as  
5 **Exhibit A**. I hereby attest that the billing rates conform to the professional rates set at my firm,  
6 and are the same rates charged to clients who pay on an hourly basis.

7 4. A chart of my firm's lodestar, broken down by categories of work performed, is  
8 attached hereto as **Exhibit B**. The time spent and categories of work by the attorneys and other  
9 professionals at my firm in this litigation are based on daily time records contemporaneously  
10 prepared by the individual professionals, maintained by my firm, and submitted, vetted and  
11 approved by both Class Counsel on a monthly basis pursuant to the Plaintiffs' Time and Expense  
12 Reporting Protocol.

13 5. As reflected in Exhibits A and B, the total number of hours expended by my firm,  
14 as approved by Class Counsel, from inception through December 31, 2021 is 3893.90 hours. The  
15 total lodestar for my firm is \$2,853,345.

16 6. My firm also incurred \$41,022.78 in expenses on behalf of the Class, which are  
17 itemized in the chart attached hereto as **Exhibit C**. These expenses were necessary to the  
18 prosecution of this litigation and submitted, vetted and approved by both Class Counsel. The  
19 expenses are also reflected in the books and records of my firm, including expense vouchers,  
20 receipts, check records, and other documents, and are an accurate record of the expenses.

21 7. Along with my other Class Counsel, my firm also oversaw a Litigation Fund set up  
22 by Cotchett, Pitre & McCarthy LLP to finance the joint prosecution of this litigation, funded by  
23 contributions by Class Counsel and all three member firms of the PSC.

8. Further detail regarding my firm, and the background and experience of professionals who worked on this case, to the extent available, is provided in my firm's resume, attached hereto as **Exhibit D**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28<sup>th</sup> day of January 2022, at Burbank, California.

/s/ Tina Wolfson

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Tina Wolfson

# **EXHIBIT A**

***In Re: Zoom Video Communications, Inc. Privacy Litigation***

<b>Firm Name</b>	Ahdoot & Wolfson, PC
<b>Reporting Period</b>	Inception through 12/31/2021

NAME	Title (Years)	TOTAL HOURS	CURRENT RATE	LODESTAR
Tina Wolfson	Partner (27)	730.00	\$ 950.00	\$ 693,500.00
Robert Ahdoot	Partner (27)	355.70	\$ 950.00	\$ 337,915.00
Theodore Maya	Partner (19)	599.50	\$ 850.00	\$ 509,575.00
Christopher Stiner	Partner (13)	609.70	\$ 800.00	\$ 487,760.00
Bradley King	Partner (11)	84.80	\$ 750.00	\$ 63,600.00
Andrew Ferich	Partner (9)	82.80	\$ 750.00	\$ 62,100.00
Deborah De Villa	Associate (5)	79.40	\$ 600.00	\$ 47,640.00
Rachel Johnson	Associate (1)	1255.10	\$ 500.00	\$ 627,550.00
Kathryn Cabrera	Paralegal	28.90	\$ 250.00	\$ 7,225.00
Windy Loritsch	Paralegal	31.90	\$ 250.00	\$ 7,975.00
Samantha Benson	Paralegal	30.90	\$ 250.00	\$ 7,725.00
Catherine Santos	Legal Assistant	5.20	\$ 150.00	\$ 780.00
	<b>TOTAL</b>	<b>3893.90</b>		<b>\$ 2,853,345.00</b>

# **EXHIBIT B**



**In Re: Zoom Video Communications Inc., Privacy Litigation - Summary by Category**

**Firm Name** Ahdoot & Wolfson, PC  
**Reporting Period** Inception through 12/31/2021

**CATEGORY CODES**

Z100 Case Administration	Z150 Experts/Consultants	Z240 Pre-Trial Motions and Submissions	Z330 Depositions	Z600 Settlement/Non-binding ADR
Z110 Client/Class Member Communications	Z200 Pleadings and Related Motions	Z250 Other Written Motions	Z400 Trial Preparation	Z610 Court Mandated Conferences
Z120 Strategy /Analysis	Z210 Discovery Motions	Z300 Written Discovery	Z410 Trial Attendance	
Z130 Adverse Party Communications	Z220 Class Certification	Z310 Document	Z420 Post-Trial Motions and Submissions	
Z140 Fact Investigation	Z230 Dispositive Motions	Z320 Document	Z500 Appeal	

NAME	Title (Years)	Z100	Z110	Z120	Z130	Z140	Z150	Z200	Z210	Z220	Z230	Z240	Z250	Z300	Z310	Z320	Z330	Z400	Z410	Z420	Z500	Z600	Z610	TOTAL HOURS	CURRENT RATE	LODESTAR
Tina Wolfson	Partner (27)	2.50	4.40	42.60	6.10	149.00	43.40	150.70	14.70	0.00	0.00	0.00	6.20	41.60	0.00	2.10	0.00	0.00	0.00	0.00	0.00	266.70	0.00	730.00	\$950.00	\$693,500.00
Robert Ahdoot	Partner (27)	0.00	3.40	2.00	0.00	1.30	0.60	6.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	342.10	0.00	355.70	\$950.00	\$337,915.00
Theodore Maya	Partner (19)	1.50	1.40	49.70	1.50	110.20	42.50	147.70	52.40	0.00	0.00	0.00	14.80	58.70	0.00	2.20	0.00	0.00	0.00	0.00	0.00	116.90	0.00	599.50	\$850.00	\$509,575.00
Christopher Stiner	Partner (13)	1.00	5.30	44.50	3.70	23.70	9.50	252.50	34.70	0.00	0.00	0.00	16.90	67.60	0.00	5.90	0.00	0.00	0.00	0.00	0.00	144.40	0.00	609.70	\$800.00	\$487,760.00
Bradley King	Partner (11)	0.00	4.20	0.00	1.30	8.30	0.00	29.40	0.00	0.00	0.00	0.00	0.00	11.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	29.90	0.00	84.80	\$750.00	\$63,600.00
Andrew Ferich	Partner (9)	0.00	0.00	5.80	0.00	0.00	0.30	3.90	1.50	0.00	0.00	0.00	2.10	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	59.20	0.00	82.80	\$750.00	\$62,100.00
Deborah De Villa	Associate (5)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	79.40	0.00	79.40	\$600.00	\$47,640.00
Rachel Johnson	Associate (1)	0.00	10.40	36.70	0.00	455.60	129.50	163.10	31.70	0.00	0.00	0.00	0.00	146.70	0.00	5.10	0.00	0.00	0.00	0.00	0.00	276.30	0.00	1255.10	\$500.00	\$627,550.00
Kathryn Cabrera	Paralegal	0.10	0.00	1.00	0.00	0.00	0.00	3.20	0.00	0.00	0.00	0.00	0.00	0.20	0.00	17.40	0.00	0.00	0.00	0.00	0.00	7.00	0.00	28.90	\$250.00	\$7,225.00
Windy Loritsch	Paralegal	0.00	1.90	0.00	0.00	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.70	0.00	19.70	0.00	0.00	0.00	0.00	0.00	9.40	0.00	31.90	\$250.00	\$7,975.00
Samantha Benson	Paralegal	9.60	1.20	0.10	0.80	1.90	0.50	7.70	1.30	0.00	0.00	0.00	0.00	4.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.50	0.00	30.90	\$250.00	\$7,725.00
Catherine Santos	Legal Assistant	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.90	0.00	5.20	\$150.00	\$780.00
<b>TOTAL</b>		<b>15.60</b>	<b>32.20</b>	<b>182.40</b>	<b>13.40</b>	<b>750.00</b>	<b>226.30</b>	<b>764.70</b>	<b>136.70</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>40.00</b>	<b>341.50</b>	<b>0.00</b>	<b>52.40</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1338.70</b>	<b>0.00</b>	<b>3893.90</b>		<b>\$2,853,345.00</b>

# **EXHIBIT C**

***In Re: Zoom Video Communications, Inc. Privacy Litigation - Summary by Expenses***

<b>Firm Name</b>	Ahdoot & Wolfson, PC
<b>Reporting Period</b>	Inception through 12/31/2021

Category	Amount
01. Outside Printing	\$88.36
02. Photocopies	\$0.43
03. Outside Fax Charges	
04. Delivery Services/Messengers	
05. Postage	\$156.82
06. Court Fees	\$982.53
07. Subpoena Fees	
08. Witness Fees	
09. Deposition Transcripts	
10. Long-Distance Telephone Calls	
11. Trial Transcripts	
12. Trial Exhibits	
13. Lexis / Westlaw	\$321.20
14. Litigation Support Vendors	
15. Experts	\$3,793.00
16. Arbitrators/Mediators	
17. Meals (excluding alcohol)	\$49.74
18. Taxi/Car Service/Other Ground Transport	\$144.28
19. Travel-Mileage Reimbursement	\$16.46
20. Travel-Airfare	\$457.96
21. Travel-Hotel	
22. Travel-Rental Car	
23. Service Fees	
24. Miscellaneous	
25. Assessments	\$35,012.00
<b>TOTAL</b>	<b>\$41,022.78</b>

# **EXHIBIT D**



Ahdoot & Wolfson, PC (“AW”) is a nationally recognized law firm founded in 1998 that specializes in complex and class action litigation, with a focus on privacy rights, unfair and anti-competitive business practices, consumer fraud, employee rights, defective products, civil rights, and taxpayer rights and unfair practices by municipalities. The attorneys at AW are experienced litigators who have often been appointed by state and federal courts as lead class counsel, including in multidistrict litigation. In over two decades of its successful existence, AW has vindicated the rights of millions of class members in protracted, complex litigation, conferring billions of dollars to the victims, and affecting real change in corporate behavior.

#### **Privacy Class Actions**

AW has been prosecuting cutting edge privacy cases on behalf of consumers since the late 1990s. AW was among the first group of attorneys who successfully advocated for the privacy rights of millions of consumers against major financial institutions based on the unlawful compilation and sale of detailed personal financial data to third-party telemarketers without the consumers’ consent. While such practices later became the subject of Gramm-Leach-Bliley Act regulation, at the time AW was prosecuting these cases before the Hon. Richard R. Kramer (Ret.) in the complex department of San Francisco Superior Court, such practices were novel and hidden from public scrutiny. AW’s work shed light on how corporations and institutions collect, store, and monetize mass data, leading to governmental regulation. AW has been at the forefront of privacy-related litigation since then.

As co-lead counsel in the *Experian Data Breach Litigation*, No. 8:15-cv-01592-AG-DFM (C.D. Cal.) (Hon. Andrew J. Guilford), which affected nearly 15 million class members, AW achieved a settlement conservatively valued at over \$150 million. Each class member is entitled to two years of additional premium credit monitoring and ID theft insurance (to begin whenever their current credit monitoring product, if any, expires), plus monetary relief (in the form of either documented losses or a default payment for non-documented claims). Experian also provided robust injunctive relief. Judge Guilford praised counsel’s efforts and efficiency in achieving the settlement, commenting “You folks have truly done a great job, both sides. I commend you.”

As an invaluable member of a five-firm Plaintiffs’ Steering Committee (“PSC”) in the *Premiera Blue Cross Customer Data Sec. Breach Litigation*, No. 3:15-cv-2633-SI (D. Or.) (Hon. Michael H. Simon), arising from a data breach disclosing the sensitive personal and medical information of 11 million

Premiera Blue Cross members, AW was instrumental in litigating the case through class certification and achieving a nationwide class settlement valued at \$74 million.

In *The Home Depot, Inc., Customer Data Sec. Breach Litigation*, No. 1:14-md-02583-TWT (N.D. Ga.) (Hon. Thomas W. Thrash Jr.), AW served on the consumer PSC and was instrumental in achieving a \$29 million settlement fund and robust injunctive relief for the consumer class. As co-lead counsel in *Gordon v. Chipotle Mexican Grill, Inc.*, No. 1:17-cv-01415-CMA-MLC (D. Colo.) (Hon. Christine M. Arguello), AW secured a settlement for the nationwide class that provides for up to \$250 in claimed damages or \$10,000 in extraordinary damages.

AW was appointed to serve as co-lead interim class counsel in the *Google Location History Litigation*, No. 5:18-cv-5062-EJD (N.D. Cal.) (Hon. Edward J. Davila), a consumer class action arising out of Google's allegedly unlawful collection and use of mobile device location information on all Android and iPhone devices.

AW also currently serves on the PSC in *Am. Med. Collection Agency, Inc., Customer Data Sec. Breach Litigation*, No. 2:19-md-2904-MCA-MAH (D.N.J.) (Hon. Madeline Cox Arleo), a class action arising out of a medical data breach that disclosed the personal and financial information of over 20 million patients, as well as many other data breach class actions.

AW's efforts have shaped privacy law precedent. As lead counsel in *Remijas v. Neiman Marcus Group, LLC*, No. 14-cv-1735 (N.D. Ill.) (Hon. Sharon Johnson Coleman), AW's attorneys successfully appealed the trial court's order granting a motion to dismiss based on lack of Article III standing. The Seventh Circuit's groundbreaking opinion, now cited in every standing brief, was the first appellate decision to consider the issue of Article III standing in data breach cases in light of the Supreme Court's decision in *Clapper v. Amnesty International USA*, 568 U.S. 398 (2013) and concluded that data breach victims have standing to pursue claims based on the increased risk of identity theft and fraud, even before that theft or fraud materializes in out-of-pocket damages. *Remijas v. Neiman Marcus Group, LLC*, 794 F.3d 688 (7th Cir. 2015) (reversed and remanded).

Similarly, in the *U.S. Office of Personnel Management Data Security Breach Litigation*, No. 1:15-mc-1394-ABJ (D.D.C.) (Hon. Amy Berman Jackson), AW, as a member of the PSC, briefed and argued, in part, the granted motions to dismiss based on standing, and briefed in part the successful appeal to the D.C. Circuit.

AW is also serving as plaintiffs' counsel in consumer privacy rights cases involving the right to control the collection and use of biometric information, successfully opposing motions to dismiss based on lack of standing. See, e.g., *Rivera v. Google LLC*, No. 19-1182 (7th Cir.) (order granting summary judgment currently on appeal to the Seventh Circuit); *Azzano v. Google LLC*, No. 2019-CH-11153 (Ill. Cir. Ct.) (Hon. Anna M. Loftus); *Molander v. Google LLC*, No. 5:20-cv-00918-EJD (N.D. Cal.) (Hon. Edward J. Davila); *Acaley v. Vimeo, Inc.*, No. 1:19-cv-7164 (N.D. Ill.) (Hon. Matthew F. Kennelly).

In *Miracle-Pond v. Shutterfly, Inc.*, No. 2019CH07050 (Cir. Ct. Cook County) (Hon. Raymond W. Mitchell), a class action arising from Shutterfly's alleged illegal collection, storage, and use of the biometrics of individuals (including those without Shutterfly accounts) who appear in photographs uploaded to Shutterfly in violation of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* AW achieved a settlement that established a \$6.75 million non-reversionary cash Settlement Fund and provided meaningful prospective relief for the benefit of class members.

In addition, AW has served and is serving as plaintiffs' counsel in class actions enforcing consumer rights under the Telephone Consumer Protection Act of 1991 ("TCPA"), such as *Chimeno-Buzzi v. Hollister Co.*, No. 1:14-cv-23120-MGC (S.D. Fla.) (Hon. Marcia G. Cooke) (class counsel in \$10 million nationwide settlement), and *Melito v. American Eagle Outfitters, Inc.*, No. 1:14-cv-02440-VEC (S.D.N.Y.) (Hon. Valerie E. Caproni) (\$14.5 million nationwide settlement).

### **Noteworthy Results in Other Consumer Class Actions**

AW has achieved excellent results as lead counsel in numerous complex class actions.

In *Alvarez v. Sirius XM Radio Inc.*, No. 2:18-cv-08605-JVS-SS (C.D. Cal.) (Hon. James V. Selna), a breach of contract class action alleging that defendant did not honor its lifetime subscriptions, AW achieved a nationwide class action settlement conservatively valued at approximately \$420 million. The settlement extended the promised lifetime subscription for the lifetime of class members who have active accounts, and provided the opportunity for class members with closed accounts to reactivate their accounts and enjoy a true lifetime subscription or recover \$100. The district court had granted the motion to compel arbitration on an individual basis, and AW appealed. AW reached the final deal points of the nationwide class action settlement literally minutes prior to oral argument in the Ninth Circuit.

As a member of the Plaintiffs' Executive Committee in the *Apple Inc. Device Performance Litigation*, No. 5:18-md-2827-EJD (N.D. Cal.) (Hon. Edward J. Davila), AW helped achieve a nationwide settlement of \$310 million minimum and \$500 million maximum. The case arose from Apple's alleged practice of deploying software updates to iPhones that deliberately degraded the devices' performance and battery life.

In *Eck v. City of Los Angeles*, No. BC577028 (LASC) (Hon. Ann I. Jones), AW achieved a \$295 million class settlement in a case alleging that an 8% surcharge on Los Angeles electricity rates was an illegal tax. Final settlement approval was affirmed on appeal in October 2019.

In *Kirby v. McAfee, Inc.*, No. 5:14-cv-02475-EJD (N.D. Cal.) (Hon. Edward J. Davila), a case arising from McAfee's auto renewal and discount practices, AW and co-counsel achieved a settlement that made \$80 million available to the class and required McAfee to notify customers regarding auto-renewals at an undiscounted subscription price and change its policy regarding the past pricing it lists as a reference to any current discount.

In *Lavinsky v. City of Los Angeles*, No. BC542245 (LASC) (Hon. Ann I. Jones), a class action

alleging the city unlawfully overcharged residents for utility taxes, AW certified the plaintiff class in litigation and then achieved a \$51 million class settlement.

As co-lead counsel in *Berman v. Gen. Motors, LLC*, No. 2:18-cv-14371-RLR (S.D. Fla.) (Hon. Robin L. Rosenberg) (vehicle oil consumption defect class action), AW achieved a \$40 million settlement.

*Lumber Liquidators Chinese-Manufactured Flooring Durability Marketing & Sales Practices Litigation*, No. 1:16-md-02743-AJT-TRJ (E.D. Va.) (Hon. Anthony J. Trenga) arose from alleged misrepresentations of laminate flooring durability, which was coordinated with MDL proceedings regarding formaldehyde emissions. As co-lead class counsel for the durability class, AW was instrumental in achieving a \$36 million settlement.

In *McKnight v. Uber Technologies, Inc.*, No. 4:14-cv-05615-JST (N.D. Cal.) (Hon. Jon S. Tigar), AW achieved a \$32.5 million settlement for the passenger plaintiff class alleging that Uber falsely advertised and illegally charged a “safe rides fee.”

In *Pantelyat v. Bank of America, N.A.*, No. 1:16-cv-08964-AJN (S.D.N.Y.) (Hon. Alison J. Nathan), a class action arising from allegedly improper overdraft fees, AW, serving as sole class counsel for plaintiffs, achieved a \$22 million class settlement, representing approximately 80% of total revenues gleaned by the bank’s alleged conduct.

#### **Current Noteworthy Leadership Roles**

Most recently, AW was selected to serve as interim co-lead class counsel in the *StubHub Refund Litigation*, No. 4:20-md-02951-HSG (N.D. Cal.) (Hon. Haywood S. Gilliam, Jr.). This consolidated multidistrict litigation alleges that StubHub retroactively changed its policies for refunds for cancelled or rescheduled events as a result of the Covid-19 pandemic and refused to offer refunds despite promising consumers 100% of their money back if events are cancelled. In appointing Ms. Wolfson as Interim Co-Lead Counsel, Judge Gilliam noted that while competing counsel were qualified, her team “proposed a cogent legal strategy,” “a process for ensuring that counsel work and bill efficiently” and “demonstrated careful attention to creating a diverse team.”

Ms. Wolfson was appointed, after competing applications, to serve as interim co-lead class counsel in the *Ring LLC Privacy Litigation*, No. 2:19-cv-10899-MWF-RAO (C.D. Cal.) (Hon. Michael W. Fitzgerald), a consolidated class action arising from Ring’s failure to implement necessary measures to secure the privacy of Ring user accounts and home-security devices, and failure to protect its customers from hackers despite being on notice of the inadequacies of its cybersecurity.

In *Clark v. American Honda Motor Co., Inc.*, No. 2:20-cv-03147-AB-MRW (C.D. Cal.) (Hon. André Birotte Jr.), Ms. Wolfson was appointed co-lead counsel in a class action arising from unintended and uncontrolled deceleration in certain Acura vehicles. In selecting Ms. Wolfson from competing applications, Judge Birotte noted: “The Court believes that Ms. Wolfson brings particular attention to the virtues of collaboration, efficiency, and cost-containment which strike the Court as



especially necessary in a case such as this. Ms. Wolfson’s appointment as Co-Lead also brings diversity to the ranks of attorneys appointed to such positions: such diversity is not simply a ‘plus factor’ but the Court firmly believes that diverse perspectives improve decision-making and leadership.”

AW was appointed to serve as co-lead interim class counsel in the *Google Location History Litigation*, No. 5:18-cv-5062-EJD (N.D. Cal.) (Hon. Edward J. Davila), a consumer class action arising out of Google’s allegedly unlawful collection and use of mobile device location information on all Android and iPhone devices.

AW also serves on the Plaintiffs’ Executive Committees in *Allergan Biocell Textured Breast Implant Products Liability Litigation*, No. 2:19-md-2921-BRM-JAD (D.N.J.) (Hon. Brian R. Martinotti), a class action alleging textured breast implants caused a rare type of lymphoma and in *ZF-TRW Airbag Control Units Products Liability Litigation*, No. 2:19-ml-2905-JAK-FFM (C.D. Cal.) (Hon. John A. Kronstadt), a class action alleging a dangerous defect in car airbag component units.

AW also was recently selected to serve on the PEC in the *Robinhood Outage Litigation*, No. 3:20-cv-1626-JD (N.D. Cal.) (Hon. James Donato), a consolidated case arising from a March 2020 outage of the online stock trading platform.

In the *Kind LLC “All Natural” Litigation*, No. 1:15-md-02645-WHP (S.D.N.Y.) (Hon. William H. Pauley III), AW was selected as interim co-lead class counsel after competing applications. AW certified three separate classes of New York, California, and Florida consumers who purchased Kind LLC’s products in a false labeling food MDL.

As part of the leadership team in *Novoa v. The Geo Group, Inc.*, No. 5:17-cv-2514-JGB-SHK (C.D. Cal.) (Hon. Jesus G. Bernal), AW certified a class of immigration detainees challenging private prison’s alleged forced labor practices.

In the *Dental Supplies Antitrust Litigation*, No. 1:16-cv-00696-BMC-GRB (E.D.N.Y.) (Hon. Brian M. Cogan), a class action alleging an anticompetitive conspiracy among three dominant dental supply companies in the United States, AW served on the plaintiffs’ counsel team that brought in an \$80 million cash settlement for the benefit of a class of approximately 200,000 dental practitioners, clinics, and laboratories.

In *Robinson v. Jackson Hewitt, Inc.*, No. 2:19-cv-09066-SDW-ESK (D.N.J.) (Hon. Susan D. Wigenton), a class action alleging that a standardized “no-poach” agreement among Jackson Hewitt and its franchisees limited mobility and compensation prospects for the tax preparer employees, AW is asserting claims on behalf of consumers under both federal antitrust and California employment laws.

In *Powell Prescription Center v. Surescripts, LLC*, No. 1:19-cv-00627 (N.D. Ill.) (Hon. John J. Tharp, Jr.), AW represents pharmacies in a class action arising from Surescripts’ alleged monopolies in both the routing and eligibility markets of the e-prescription industry.

### Attorney Profiles

**Tina Wolfson** graduated Harvard Law School *cum laude* in 1994. Ms. Wolfson began her civil litigation career at the Los Angeles office of Morrison & Foerster, LLP, where she defended major corporations in complex actions and represented indigent individuals in immigration and deportation trials as part of the firm's *pro bono* practice. She then gained further invaluable litigation and trial experience at a boutique firm, focusing on representing plaintiffs on a contingency basis in civil rights and employee rights cases. Since co-founding AW in 1998, Ms. Wolfson has led numerous class actions to successful results. Ms. Wolfson is a member of the California, New York, and District of Columbia Bars.

Recognized for her deep class action experience, Ms. Wolfson frequently lectures on numerous class action topics across the country. She is a guest lecturer on class actions at the University of California at Irvine Law School. Her notable speaking engagements include:

- Class Action Mastery Forum at the University Of San Diego School of Law (Consumer Class Actions Roundtable) March 2020, featuring Hon. Lucy H. Koh, Hon. Edward M. Chen, and Hon. Fernando M. Olguin.
- Class Action Mastery Forum at the University Of San Diego School of Law (Data Breach/Privacy Class Action Panel) January 16, 2019.
- Association of Business Trial Lawyers: "Navigating Class Action Settlement Negotiations and Court Approval: A Discussion with the Experts," Los Angeles May 2017, featuring Hon. Philip S. Gutierrez and Hon. Jay C. Gandhi.
- CalBar Privacy Panel: "Privacy Law Symposium: Insider Views on Emerging Trends in Privacy Law Litigation and Enforcement Actions in California," Los Angeles Mar. 2017 (Moderator), featuring Hon. Kim Dunning.
- American Conference Institute: "2nd Cross-Industry and Interdisciplinary Summit on Defending and Managing Complex Class Actions," April 2016, New York: Class Action Mock Settlement Exercise featuring the Hon. Anthony J. Mohr.
- Federal Bar Association: N.D. Cal. Chapter "2016 Class Action Symposium," San Francisco Dec. 2016 (Co-Chair), featuring Hon. Joseph F. Anderson, Jr. and Hon. Susan Y. Illston.
- Federal Bar Association: "The Future of Class Actions: Cutting Edge Topics in Class Action Litigation," San Francisco Nov. 2015 (Co-Chair & Faculty), featuring Hon. Jon S. Tigar and Hon. Laurel Beeler.
- American Association for Justice: AAJ 2015 Annual Convention - "The Mechanics of Class Action Certification," July 2015, Montreal, Canada.
- HarrisMartin: Data Breach Litigation Conference: The Coming of Age - "The First Hurdles: Standing and Other Motion to Dismiss Arguments," March 2015, San Diego.
- Bridgeport: 2015 Annual Consumer Class Action Conference, February 2015, Miami (Co-Chair).

- Venable, LLP: Invited by former opposing counsel to present mock oral argument on a motion to certify the class in a food labeling case, Hon. Marilyn Hall Patel (Ret.) presiding, October 2014, San Francisco.
- Bridgeport: 15th Annual Class Action Litigation Conference – “Food Labeling and Nutritional Claim Specific Class Actions,” September 2014, San Francisco (Co-Chair and Panelist).
- Bridgeport: 2014 Consumer Class Action Conference – “Hot Topics in Food Class Action Litigation,” June 2014, Chicago.
- Perrin Conferences: Challenges Facing the Food and Beverage Industries in Complex Consumer Litigations, invited to discuss cutting edge developments in settlement negotiations, notice, and other topics, April 2014, Chicago.
- Bridgeport: Class Action Litigation & Management Conference – “Getting Your Settlement Approved,” April 2014, Los Angeles.
- HarrisMartin: Target Data Security Breach Litigation Conference – “Neiman Marcus and Michael’s Data Breach Cases and the Future of Data Breach Cases,” March 2014, San Diego.
- Bridgeport: Advertising, Marketing & Media Law: Litigation and Best Management Practices – “Class Waivers and Arbitration Provisions Post-*Concepcion* / *Oxford Health Care*,” March 2014, Los Angeles.

Ms. Wolfson currently serves as a Ninth Circuit Lawyer Representative for the Central District of California, as Vice President of the Federal Litigation Section of the Federal Bar Association, as a member of the American Business Trial Lawyer Association, as a participant at the Duke Law School Conferences and the Institute for the Advancement of the American Legal System, and on the Board of Public Justice.

**Robert Ahdoot** graduated from Pepperdine Law School *cum laude* in 1994, where he served as Literary Editor of the Pepperdine Law Review. Mr. Ahdoot clerked for the Honorable Paul Flynn at the California Court of Appeals, and then began his career as a civil litigator at the Los Angeles office of Mendes & Mount, LLP, where he defended large corporations and syndicates such as Lloyds of London in complex environmental and construction-related litigation as well as a variety of other matters. Since co-founding AW in 1998, Mr. Ahdoot had led numerous class actions to successful results. Recognized for his extensive class action experience, Mr. Ahdoot frequently lectures on numerous class action topics across the country. His notable speaking engagements include:

- MassTorts Made Perfect: Speaker Conference, April 2019, Las Vegas: “Llegal Fees: How Companies and Governments Charge The Public, and How You Can Fight Back.”
- HarrisMartin: Lumber Liquidators Flooring Litigation Conference, May 2015, Minneapolis: “Best Legal Claims and Defenses.”

- Bridgeport: 15th Annual Class Action Litigation Conference, September 2014, San Francisco: “The Scourge of the System: Serial Objectors.”
- Strafford Webinars: Crafting Class Settlement Notice Programs: Due Process, Reach, Claims Rates and More, February 2014: “Minimizing Court Scrutiny and Overcoming Objector Challenges.”
- Pincus: Wage & Hour and Consumer Class Actions for Newer Attorneys: The Do’s and Don’ts, January 2014, Los Angeles: “Current Uses for the 17200, the CLRA and PAGA.”
- Bridgeport: 2013 Class Action Litigation & Management Conference, August 2013, San Francisco: “Settlement Mechanics and Strategy.”

**Theodore W. Maya** graduated from UCLA Law School in 2002 after serving as Editor-in-Chief of the UCLA Law Review. From July 2003 to August 2004, Mr. Maya served as Law Clerk to the Honorable Gary Allen Feess in the United States District Court for the Central District of California. Mr. Maya was also a litigation associate in the Los Angeles offices of Kaye Scholer LLP for approximately eight years where he worked on a large variety of complex commercial litigation from inception through trial. Mr. Maya was named “Advocate of the Year” for 2007 by the Consumer Law Project of Public Counsel for successful pro bono representation of a victim of a large-scale equity fraud ring. As a partner at AW, Mr. Maya has extensive experience litigating all aspects of complex and consumer class actions.

**Bradley K. King** is a member of the State Bars of California, New Jersey, New York, and the District of Columbia. He graduated from Pepperdine University School of Law in 2010, where he served as Associate Editor of the Pepperdine Law Review. He worked as a law clerk for the California Office of the Attorney General, Correctional Law Section in Los Angeles and was a certified law clerk for the Ventura County District Attorney’s Office. Mr. King began his legal career at a boutique civil rights law firm, gaining litigation experience in a wide variety of practice areas, including employment law, police misconduct, municipal contracts, criminal defense, and premises liability cases. During his career at AW, Mr. King has focused on consumer class actions, and privacy class actions in particular. He has served as appointed interim lead counsel and has extensive experience litigating consolidated and MDL class actions with AW, including numerous large data breach cases that have resulted in nationwide class settlements.

**Christopher E. Stiner** graduated from Duke University School of Law *cum laude* in 2007 and is a member of the California and New York Bars. Mr. Stiner began his legal career at the New York office of Milbank Tweed working on finance matters for some of the world’s largest financial institutions. Several years later, Mr. Stiner transitioned to a litigation practice at the Los Angeles office of Katten Muchin, again representing large financial institutions and other corporate clients. Chris also worked as a clerk for the Honorable Thomas B. Donovan in the Central District of California Bankruptcy Court. In 2020, Mr. Stiner joined AW to pursue his desired focus on

consumer class actions with a particular interest in consumer finance and banking matters.

**Andrew W. Ferich** is admitted to the bars of Pennsylvania, New Jersey, and the District of Columbia. Mr. Ferich received his law degree from Villanova University's Charles Widger School of Law in 2012, where he served as Executive Editor of the *Journal of Catholic Social Thought*. Mr. Ferich has significant experience in consumer protection, data privacy, ERISA/retirement plan, and whistleblower/*qui tam* litigation. Prior to joining the firm, Mr. Ferich was a senior associate at a well-known Philadelphia-area class action law firm. Before joining the plaintiffs' bar, Mr. Ferich was an associate at an AmLaw 200 national litigation firm in Philadelphia where he focused his practice on commercial litigation and financial services litigation. Mr. Ferich has represented a wide array of clients and has received numerous court-appointed leadership positions in large class actions. Mr. Ferich possesses major jury trial experience and has assisted in litigating cases that have collectively resulted in over \$100 million in settlement value in damages and injunctive relief for various classes and groups of people.

**Deborah De Villa** is an associate attorney at Ahdoot Wolfson and a member of the State Bars of New York and California. She graduated from Pepperdine University School of Law in 2016, where she earned the CALI Excellence for the Future Award in immigration law, business planning and commercial law. During law school, Ms. De Villa completed internships at the Los Angeles District Attorney's Office, Hardcore Gangs Unit, and at the Supreme Court of the Philippines, Office of the Court Administrator. Born in the Philippines, Ms. De Villa moved to Florida at the age of sixteen to attend IMG Golf Academy as a full-time student-athlete. Ms. De Villa earned a scholarship to play NCAA Division 1 college golf at Texas Tech University, where she graduated *magna cum laude* with a Bachelor of Arts in Psychology and a minor in Legal Studies. Ms. De Villa has gained substantial experience litigating class actions with Ahdoot Wolfson and focuses her practice on consumer protection and privacy class actions.

**Rachel Johnson** is an associate attorney at Ahdoot Wolfson and a member of the State Bar of California. Ms. Johnson graduated from Santa Clara University School of Law as an Emery Merit Scholar with a certificate in High Tech Law. During law school, she worked in-house for Silicon Valley tech companies and as an associate for the Entrepreneurs' Law Clinic at Santa Clara Law. Prior to attending law school, Ms. Johnson had a technical career as a scientist and engineer. She holds a Master's Degree from Stanford University School of Engineering and worked on large scale, complex environmental projects for international consulting firms and the California Environmental Protection Agency and served as a senior technical advisor at the United States Department of Interior. At Ahdoot Wolfson, Ms. Johnson focuses on consumer protection and antitrust class actions.